

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
SOUTHERN DIVISION**

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|--|---|--------------------|
| In Re: | § | Case No. 22-90032 |
| | § | |
| GWG Holdings, Inc., <i>et al.</i> ¹ | § | (Chapter 11) |
| | § | |
| Debtor. | § | Judge Marvin Isgur |

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

THOMAS HORTON AND FRANK MOORE, (collectively the “Proposed Class Representatives”) on behalf of themselves and a proposed class of all other similarly situated, in *Bayati v GWG Holdings, Inc., et al.*, No. 3:22-cv-00410-B in the United States District Court for the Northern District of Texas (L Bond Investor Class Action), hereby gives notice of their appearance in this case by and through the following-named counsel noted below. Please ensure that all orders, notices, pleadings, and other documents filed or served in this case be served to counsel as noted:

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¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); and GWG Life USA, LLC (5538). The location of Debtor GWG Holdings, Inc.’s principal place of business and the Debtors’ service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors’ proposed claims and noticing agent: <https://donlinrecano.com/gwg>.

-and-

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PLEASE TAKE FURTHER NOTICE that pursuant to §1109(b) of the Bankruptcy Code, the preceding demand includes not only the notices and papers referred to in the Bankruptcy Rules and sections of the Bankruptcy Code specified above, but also includes, without limitation, any plans of reorganization, notices of hearings orders, pleadings, motions, applications, complaints, demands, requests, petitions, disclosure statements, memoranda, briefs and any other documents brought before this Court with respect to these proceedings, whether formal or informal, whether written or oral, whether transmitted or conveyed by mail, hand delivery, telephone, telecopies, telegraph or telex or otherwise filed or made with regard to the above-captioned case and proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this *Notice of Appearance* nor any later appearance, pleadings, proof of claim, claim or suit shall constitute a waiver of (i) the right to have final orders in non-core matters entered only after *de novo* review by a District Judge, (ii) the right trial by jury in any proceeding related to this case or any case, controversy, or proceeding related to this case (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this notice, (v) an election of remedy, (vi) any other rights, claims, actions defenses, setoffs, or recoupments as appropriate, in law or in equity, under any agreements all of which rights, claims, actions, defenses, setoffs, and recoupment.

DATE: May 27, 2022.

Respectfully submitted:

/s/ Douglas H. Mannal*

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**PROPOSED CO-COUNSEL FOR THOMAS HORTON
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* signed with permission

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing *Notice of Appearance and Request for Notices* has been served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on May 27, 2022.

/s/ Wayne Kitchens
Wayne Kitchens